## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

TRUSTEES OF THE NATIONAL ELEVATOR INDUSTRY PENSION, HEALTH BENEFIT AND EDUCATIONAL FUNDS,

Plaintiffs,

CIVIL ACTION NO. 02-3653 V.

HB TECH ELEVATOR AND ESCALATOR INC.

Defendant.

## PRAECIPE FOR ENTRY OF DEFAULT

## TO THE CLERK:

Please enter default pursuant to Rule 55(a) of the Federal Rules of Civil Procedure in favor of Plaintiffs and against the Defendant, HB Tech Elevator and Escalator Inc. in the above-captioned matter for failure to plead or otherwise defend in answer to the Plaintiff's Complaint, and for failure to appear.

Defendant was properly served with the Complaint in this action, as set forth in the previously filed Affidavit of Service of Process.

WHEREFORE, Plaintiffs request that default be entered on the docket in the above-captioned matter in their favor and against Defendant, HB Tech Elevator and Escalator Inc.

Respectfully submitted,

O'DONOGHUE & O'DONOGHUE Date: August 6, 2002

> Constitution Place, Suite 515 325 Chestnut Street Philadelphia, PA 19106 Telephone (215) 629-4970 Facsimile (215) 629-4996

By:

Robert P. Curley Attorney I.D. No. 55760

By:

David D. Capuano Attorney I.D. No. 70238

Attorneys for Plaintiffs